

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RENEE MAZER	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	
	:	
	:	NO.: 11-6816
LYNNE GOLD-BIKIN,	:	
CHRISTOPHER BEDALI,	:	
WEBER, GALLAGHER, SIMPSON,	:	
STAPLETON, FIRES, NEWBY, LLP,	:	
INTERSTATE CREDIT & COLLECTION;	:	
and JOHN DOES 1-10	:	
	:	
Defendants.	:	

ORDER

AND NOW, this _____ day of _____, 2012, upon consideration of Plaintiff's Motion to Enlarge her Response deadline to attorney defendants' Motion to Dismiss, and any response thereto, it is hereby ORDERED and DECREED that Plaintiff's Motion is GRANTED, and Plaintiff may respond to Attorney Defendants' Motion to Dismiss (Docket No. 25) within thirty (30) days from the date of entry of this Order.

AND IT IS SO ORDERED.

Anita B. Brody, J.

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CHRISTOPHER BEDALI,	:	
WEBER, GALLAGHER, SIMPSON,	:	
STAPLETON, FIRES, NEWBY, LLP,	:	
INTERSTATE CREDIT & COLLECTION;	:	
and JOHN DOES 1-10	:	
	:	
Defendants.	:	

**PLAINTIFF’S MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO
ATTORNEY DEFENDANTS’ MOTION TO DISMISS (DOCKET NO. 25)**

This is an action in, *inter alia*, legal malpractice secondary to an underlying matrimonial dispute. On March 6, 2012, Attorney Defendants filed their Motion to Dismiss Plaintiff’s Amended Complaint.

This Motion is timely. The foregoing constitutes *good cause*. FRCP 6.

Due to the complexity of attorney defendants’ Motion, Plaintiff respectfully requests this Honorable Court for thirty (30) days enlargement from the adjudication of this Motion to respond. Defendants’ Memorandum of Law itself is approximately twenty (20) pages contending, *inter alia*, failure of “ripeness,” “Gist of the Action,” and claimed speculative damages – all requiring significant briefing in response.

WHEREFORE, Plaintiff respectfully requests the Court grant thirty (30) days enlargement for Plaintiff to respond to attorney defendants’ Motion to Dismiss from the date of adjudication of this Motion consistent with the attached proposed Order.

WEISBERG LAW, P.C.

/s/ Matthew B. Weisberg
Matthew B. Weisberg, Esquire
Attorney for Plaintiffs

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INTERSTATE CREDIT & COLLECTION;	:	
and JOHN DOES 1-10	:	
	:	
Defendants.	:	

CERTIFICATE OF SERVICE

I, Matthew B. Weisberg, Esquire, hereby certify that on this 26th day of March, 2012, a true and correct copy of the foregoing Plaintiff's Motion for Enlargement of Time to Respond to Attorney Defendants' Motion to Dismiss (Docket No. 25) was served via ECF upon the following parties:

Paul C. Troy, Esq.
Kane Pugh Knoell and Driscoll, L.L.P.
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Richard J. Perr, Esq.
Jennifer T. Root, Esq.
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WEISBERG LAW, P.C.

/s/ Matthew B. Weisberg
Matthew B. Weisberg, Esquire
Attorney for Plaintiffs